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CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

9 UNITED STATES OF AMERICA,) CRIMINAL INDICTMENT
10 PLAINTIFF,)
11 vs.)
12 MARIA LARKIN,) VIOLATIONS:
13 DEFENDANT.) 31 U.S.C. §§ 5324(a)(3) and (d)(1) and (2)
14 & 31 C.F.R. § 103.11- Structuring
Transactions to Evade Reporting
Requirements
15 18 U.S.C. § 2 - Aiding and Abetting

THE GRAND JURY CHARGES THAT:

17 On or about the dates set forth below, in the District of Nevada,

MARIA LARKIN

19 defendant herein, did knowingly and for the purpose of evading the reporting requirements
20 of Section 5313(a), Title 31, United States Code, and the regulations promulgated
21 thereunder, structure, attempt to structure and assist in structuring the following transactions
22 with Bank of America, a domestic financial institution, using the account number identified
23 herein as x2724:

	<u>Date</u>	<u>Description of Transaction</u>
1		
2	January 10, 2011	Two (2) cash deposits of \$9,900.00 and \$10,000.00
3	April 18, 2011	Four (4) cash deposits of \$10,000.00, \$10,000.00, \$10,000.00, and \$5,000.00
4		
5	April 20, 2011	Two (2) cash deposits of \$5,000.00 and \$10,000.00
6	May 9, 2011	Four (4) cash deposits of \$10,000.00, \$10,000.00, \$10,000.00, and \$5,000.00
7		
8	May 10, 2011	Three (3) cash deposits of \$10,000.00, \$10,000.00, and \$10,000.00
9		
10	May 13, 2011	Three (3) cash deposits of \$10,000.00, \$10,000.00, and \$10,000.00
11		
12	May 19, 2011	Three (3) cash deposits of \$9,500.00, \$9,700.00, and \$6,000.00
13		All in violation of Title 31, United States Code, Sections 5324(a)(3) and (d)(1) and
14		(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code,
15		Section 2.
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FORFEITURE ALLEGATION

Structuring Financial Transactions

1. The allegations contained in this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 31, United States Code, Section 5317(c)(1).

6 2. Upon conviction of the felony offenses charged in this Criminal Indictment,

MARIA LARKIN,

8 defendant herein, shall forfeit to the United States of America, all property, real or personal,
9 involved in violations of Title 31, United States Code, Sections 5313(a), and 5324(a)(1) and
10 (a)(3); and Title 31, Code of Federal Regulations, Section 103.11, traceable to such
11 violations, or a conspiracy to commit such violations: \$308,100.00 in United States currency.

12 All pursuant to Title 31, United States Code, Sections 5313(a), and 5324(a)(1) and
13 (a)(3); Title 31, Code of Federal Regulations, Section 103.11; and Title 31, United States
14 Code, Section 5317(c)(1).

DATED: this 4th day of September 2012

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney

~~CRISTINA D. SILVA
Assistant United States Attorney~~